

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TENNESSEE
GREENEVILLE DIVISION**

B.P., H.A., and S.H., individually, and on behalf of all others similarly situated,)
Plaintiffs,) No: 2:23-cv-00071-TRM-JEM
v.)
CITY OF JOHNSON CITY, TENNESSEE,)
a government entity, et al.)
Defendants.)

**DEFENDANT JEFF LEGAULT'S ANSWER TO
SECOND AMENDED CLASS ACTION COMPLAINT**

The Defendant, Jeff Legault, answers the allegations in the Second Amended Class Action Complaint (“SAC”) as follows:

In response to the un-numbered section of the Second Amended Complaint that precedes the first numbered paragraph, it is denied Legault was guilty of any knowing, intentional, reckless, negligent or otherwise wrongful conduct with respect to any investigation of Sean Williams (“Williams”), Female 9, or any other investigation that is material to the SAC. It is specifically denied that Legault participated in any alleged sex trafficking venture, knowingly or otherwise.

It is denied Legault participated in any sex crimes investigation of Williams. It is denied Legault conspired or otherwise interfered with any investigation into Williams alleged criminal activities or in any other sex crimes investigation. It is denied Legault received any financial or other benefit from Williams or any person associated with Williams. It is denied Legault engaged in any pattern or practice of discriminatory conduct towards women who reported sexual assault by Williams or any other person. It is denied Legault ignored or refused to investigate complaints of

sexual assault allegedly committed by Williams or any other person. It is denied Legault knowingly conspired to destroy and/or conceal any evidence.

It is denied Legault intimidated or dissuaded women from pursuing criminal charges. It is specifically denied that Legault's approval of a report for the arrest Female 9 is any way material to or otherwise relates to the claims asserted in this lawsuit. It is also denied that Legault had any knowledge that Female 9 was a witness to or a victim of Williams' alleged crimes, and it is denied that Legault had any knowledge that Female 9 was interviewed by any law enforcement agency in connection with any investigation into Williams.

It is admitted that in or about August 2022, Johnson City, Tennessee (the "City") retained a third-party to conduct a review of the Johnson City Police Department's ("JCPD") sexual assault investigations during 2018-2020. It is admitted that report was released by the City on or about July 18, 2023. Legault would show the content of the report speaks for itself and is best evidence thereof.

Legault lacks sufficient information to admit or deny the remaining allegations in the un-numbered paragraph of the SAC that precedes the first numbered paragraph. Accordingly, Legault demands proof of each and every accusation contained therein.

To the extent that any allegation in the un-numbered paragraphs allege, imply or infer that Jeff Legault violated any law or that he is in any way liable to the Plaintiffs in this matter, such is expressly denied.

1. Paragraph 1 contains legal conclusions to which no response is required.

To the extent a response is required, it is denied Legault was guilty of any wrongful conduct or is otherwise liable to the Plaintiffs under any of the statutes cited in paragraph 1.

2. In response to paragraph 2, it is admitted this Court has federal question jurisdiction over

the claims which arise under the Trafficking Victims Protection Act and 42 U.S.C. §1983.

3. The allegations in paragraph 3 are admitted.

4. Legault is without information sufficient to admit or deny the allegations in paragraph 4.

5. Legault is without information sufficient to admit or deny the allegations in paragraph 5.

6. Legault is without information sufficient to admit or deny the allegations in paragraph 6.

7. The allegations in paragraph 7 are directed at another defendant. Accordingly, no response from Legault is required.

8. The allegations in paragraph 8 are directed at another defendant. Accordingly, no response from Legault is required.

9. The allegations in paragraph 9 are directed at an individual that is no longer a party to this action. Accordingly, no response from Legault is required.

10. The allegations in paragraph 10 are directed at another defendant. Accordingly, no response from Legault is required.

11. The allegations in paragraph 11 are directed at an individual that is no longer a party to this action. Accordingly, no response from Legault is required.

12. The allegations in paragraph 12 are admitted.

13. The allegations in paragraph 13 are directed at an individual that is no longer a party to this action. Accordingly, no response from Legault is required.

14. The allegations in paragraph 14 are directed at other unknown individuals. Accordingly, no response from Legault is required.

15. The allegations in paragraph 15 are denied.

16. The allegations in paragraph 16 are denied.

17. The allegations in paragraph 17 are denied.

18. In response to the statement after the "I" but before paragraph 18, it is denied Legault received any benefit from Williams.

In response to paragraph 18, Legault is without information sufficient to admit or deny the allegations in paragraph 18.

19. Legault is without information sufficient to admit or deny the allegations in paragraph 19.

20. Legault is without information sufficient to admit or deny the allegations in paragraph 20.

21. Legault is without information sufficient to admit or deny the allegations in paragraph 21.

22. Legault is without information sufficient to admit or deny the allegations in paragraph 22.

23. Legault is without sufficient information to admit or deny the allegations in paragraph 23.

24. Legault is without sufficient information to admit or deny the allegations in paragraph 24.

25. Legault is without sufficient information to admit or deny the allegations in paragraph 25.

26. Legault is without sufficient information to admit or deny the allegations in paragraph 26.

27. Legault is without sufficient information to admit or deny the allegations in paragraph

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28. Legault is without sufficient information to admit or deny the allegations in paragraph

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29. Legault is without sufficient information to admit or deny the allegations in paragraph

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30. Legault is without sufficient information to admit or deny the allegations in paragraph

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31. Legault is without sufficient information to admit or deny the allegations in paragraph

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32. Legault is without sufficient information to admit or deny the allegations in paragraph

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33. Legault is without sufficient information to admit or deny the allegations in paragraph

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34. Legault is without sufficient information to admit or deny the allegations in paragraph

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35. Legault is without sufficient information to admit or deny the allegations in paragraph

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36. Legault is without sufficient information to admit or deny the allegations in paragraph

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37. Legault is without sufficient information to admit or deny the allegations in paragraph

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38. Legault is without sufficient information to admit or deny the allegations in paragraph

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39. Legault is without sufficient information to admit or deny the allegations in paragraph 39.

40. Legault is without sufficient information to admit or deny the allegations in paragraph 40.

41. Legault is without sufficient information to admit or deny the allegations in paragraph 41.

42. Legault is without sufficient information to admit or deny the allegations in paragraph 42.

43. Legault is without sufficient information to admit or deny the allegations in paragraph 43.

44. Legault is without sufficient information to admit or deny the allegations in paragraph 44.

45. Legault is without sufficient information to admit or deny the allegations in paragraph 45.

46. Legault is without sufficient information to admit or deny the allegations in paragraph 46.

47. Legault is without sufficient information to admit or deny the allegations in paragraph 47.

48. Legault is without sufficient information to admit or deny the allegations in paragraph 48.

49. Legault is without sufficient information to admit or deny the allegations in paragraph 49.

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50. Legault is without sufficient information to admit or deny the allegations in paragraph 50.

51. Legault is without sufficient information to admit or deny the allegations in paragraph 51.

52. Legault is without sufficient information to admit or deny the allegations in paragraph 52.

53. Legault is without sufficient information to admit or deny the allegations in paragraph 53.

54. Legault is without sufficient information to admit or deny the allegations in paragraph 54.

55. Legault is without sufficient information to admit or deny the allegations in paragraph 55.

56. Legault is without sufficient information to admit or deny the allegations in paragraph 56.

57. The allegations in paragraph 57 are denied.

58. The allegations in paragraph 58 are denied.

59. The allegations in paragraph 59 are denied.

60. The allegations in paragraph 60 are denied.

61. The allegations in paragraph 61 are denied.

62. Legault is without sufficient information to admit or deny the allegations in paragraph 62.

63. Legault is without sufficient information to admit or deny the allegations in paragraph 63.

It is specifically denied that any such “extortion scheme” existed, much less that Legault participated in such an alleged scheme.

64. The allegations in paragraph 64 are admitted.

65. In response to paragraph 65, it is denied any “extortion scheme” existed, thus, it is denied the Female 3 incident had the potential to reveal any unlawful conduct on behalf of Legault.

66. Legault is without sufficient information to admit or deny the allegations in paragraph 66.

67. Legault is without sufficient information to admit or deny the allegations in paragraph 67.

68. Legault is without sufficient information to admit or deny the allegations in paragraph 68.

69. Legault is without sufficient information to admit or deny the allegations in paragraph 69.

70. Legault is without sufficient information to admit or deny the allegations in paragraph 70.

71. Legault is without sufficient information to admit or deny the allegations in paragraph 71.

72. Legault is without sufficient information to admit or deny the allegations in paragraph 72.

73. Legault is without sufficient information to admit or deny the allegations in paragraph

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74. Legault is without sufficient information to admit or deny the allegations in paragraph 74.

75. Legault is without sufficient information to admit or deny the allegations in paragraph 75.

76. Legault is without sufficient information to admit or deny the allegations in paragraph 76.

77. The allegations in paragraph 77 are admitted.

78. Legault is without sufficient information to admit or deny the allegations in paragraph 78.

79. Legault is without sufficient information to admit or deny the allegations in paragraph 79.

80. The allegations in paragraph 80 are denied.

81. In response to paragraph 81, it is admitted that JCPD seized a safe from Williams' apartment on or about September 19, 2020.

Legault is without information sufficient to admit or deny the remaining allegations in paragraph 81.

82. In response to paragraph 82, it is admitted that a search warrant was obtained to search the contents of the safe.

Legault is without sufficient information to admit or deny who obtained the warrant.

83. Legault is without sufficient information to admit or deny the allegations in paragraph 83.

84. Legault is without sufficient information to admit or deny the allegations in paragraph 84.

85. It is denied that “hundreds of thousands of dollars in cash” were left in the safe.

Legault is without sufficient information to admit or deny the remaining allegations in paragraph 85.

86. The allegations in paragraph 86 are denied. It is specifically denied that the safe contained \$500,000 or that JCPD officers retained any funds from the safe.

87. The allegations in paragraph 87 are denied.

88. In response to paragraph 88, it is denied Legault benefitted from or participated in any sex trafficking conspiracy.

Legault is without information sufficient to admit or deny the remaining allegations in paragraph 88.

89. Legault is without sufficient information to admit or deny the allegations in paragraph 89.

90. Legault is without sufficient information to admit or deny the allegations in paragraph 90.

91. Legault is without sufficient information to admit or deny the allegations in paragraph 91.

92. Legault is without sufficient information to admit or deny the allegations in paragraph 92.

93. Legault is without sufficient information to admit or deny the allegations in paragraph 93.

94. Legault is without sufficient information to admit or deny the allegations in paragraph 94.

95. In response to paragraph 95, it is denied Legault had knowledge of rape complaints against Williams as early as November 7, 2019.

Legault is without sufficient information to admit or deny the allegations in paragraph 95.

96. Legault is without sufficient information to admit or deny the allegations in paragraph 96.

97. Legault is without sufficient information to admit or deny the allegations in paragraph 97.

98. In response to paragraph 98, it is denied Legault went to a clinic to take a statement from B.P. or that he ever participated in any investigation involving B.P.

Legault is without sufficient information to admit or deny the remaining allegations in paragraph 98.

99. In response to paragraph 99, it is denied Legault told anyone, including B.P., that he had heard of other women complaining of sexual assault by Williams.

Legault is without sufficient information to admit or deny the remaining allegations in paragraph 99.

100. In response to paragraph 100, it is denied Legault ever participated in any investigation involving B.P.

Legault is without sufficient information to admit or deny the remaining allegations in paragraph 100.

101. Legault is without sufficient information to admit or deny the allegations in paragraph

101.

102. Legault is without sufficient information to admit or deny the allegations in paragraph 102.

103. Legault is without sufficient information to admit or deny the allegations in paragraph 103.

104. Legault is without sufficient information to admit or deny the allegations in paragraph 104.

105. Legault is without sufficient information to admit or deny the allegations in paragraph 105.

106. In response to paragraph 106, it is denied Legault had any role with respect to the investigation of Female 2's claims.

Legault is without sufficient information to admit or deny the remaining allegations in paragraph 106.

107. Legault is without sufficient information to admit or deny the allegations in paragraph 107.

108. Legault is without sufficient information to admit or deny the allegations in paragraph 108.

109. In response to paragraph 109, it is denied Legault had any role with respect to the investigation of Female 9's claims.

Legault is without sufficient information to admit or deny the remaining allegations in paragraph 109.

110. Legault is without sufficient information to admit or deny the allegations in paragraph

110.

111. Legault is without sufficient information to admit or deny the allegations in paragraph 111.

112. Legault is without sufficient information to admit or deny the allegations in paragraph 112.

113. Legault is without sufficient information to admit or deny the allegations in paragraph 113.

114. Legault is without sufficient information to admit or deny the allegations in paragraph 114.

115. Legault is without sufficient information to admit or deny the allegations in paragraph 115.

116. Legault is without sufficient information to admit or deny the allegations in paragraph 116.

117. Legault is without sufficient information to admit or deny the allegations in paragraph 117.

118. Legault is without sufficient information to admit or deny the allegations in paragraph 118.

119. Legault is without sufficient information to admit or deny the allegations in paragraph 119.

120. Legault is without sufficient information to admit or deny the allegations in paragraph 120.

121. In response to paragraph 121, it is denied Legault had any role with respect to the

Female 11 investigation.

Legault is without sufficient information to admit or deny the remaining allegations in paragraph 121.

122. Legault is without sufficient information to admit or deny the allegations in paragraph 122.

123. Legault is without sufficient information to admit or deny the allegations in paragraph 123.

124. Legault is without sufficient information to admit or deny the allegations in paragraph 124.

125. Legault is without sufficient information to admit or deny the allegations in paragraph 125.

126. Legault is without sufficient information to admit or deny the allegations in paragraph 126.

127. Legault is without sufficient information to admit or deny the allegations in paragraph 127.

128. Legault is without sufficient information to admit or deny the allegations in paragraph 128.

129. Legault is without sufficient information to admit or deny the allegations in paragraph 129.

130. Legault is without sufficient information to admit or deny the allegations in paragraph 130.

131. Legault is without sufficient information to admit or deny the allegations in paragraph

131.

132. Legault is without sufficient information to admit or deny the allegations in paragraph 132.

133. Legault is without sufficient information to admit or deny the allegations in paragraph 133.

134. Legault is without sufficient information to admit or deny the allegations in paragraph 134.

135. Legault is without sufficient information to admit or deny the allegations in paragraph 135.

136. In response to paragraph 136, it is denied Legault had any role with respect to the investigation of Female 12's claims.

Legault is without sufficient information to admit or deny the remaining allegations in paragraph 136.

137. Legault is without sufficient information to admit or deny the allegations in paragraph 137.

138. Legault is without sufficient information to admit or deny the allegations in paragraph 138.

139. Legault is without sufficient information to admit or deny the allegations in paragraph 139.

140. In response to paragraph 140, it is denied Legault was aware of rape complaints against Williams as early as November 2019.

It is denied Legault was ever a special victims investigator or a member of the Special

Victims Unit.

Legault is without sufficient information to admit or deny the remaining allegations in paragraph 140.

141. The allegations in paragraph 141 are denied.

142. Legault is without sufficient information to admit or deny the allegations in paragraph 142.

143. The allegations in paragraph 143 are denied.

144. The allegations in paragraph 144 are denied.

145. Legault is without sufficient information to admit or deny the allegations in paragraph 145.

146. Legault is without sufficient information to admit or deny the allegations in paragraph 146.

147. Legault is without sufficient information to admit or deny the allegations in paragraph 147.

148. Legault is without sufficient information to admit or deny the allegations in paragraph 148.

149. Legault is without sufficient information to admit or deny the allegations in paragraph 149.

150. Legault is without sufficient information to admit or deny the allegations in paragraph 150.

151. Legault is without sufficient information to admit or deny the allegations in paragraph 151.

152. Legault is without sufficient information to admit or deny the allegations in paragraph 152.

153. Legault is without sufficient information to admit or deny the allegations in paragraph 153.

154. Legault is without sufficient information to admit or deny the allegations in paragraph 154.

155. Legault is without sufficient information to admit or deny the allegations in paragraph 155.

156. Legault is without sufficient information to admit or deny the allegations in paragraph 156.

157. Legault is without sufficient information to admit or deny the allegations in paragraph 157.

158. Legault is without sufficient information to admit or deny the allegations in paragraph 158.

159. Legault is without sufficient information to admit or deny the allegations in paragraph 159.

160. In response to paragraph 160, it is denied that Legault did anything to obstruct any investigation into Williams.

161. Legault is without sufficient information to admit or deny the allegations in paragraph 161.

162. Legault is without sufficient information to admit or deny the allegations in paragraph 162.

163. Legault is without sufficient information to admit or deny the allegations in paragraph 163.

164. Legault is without sufficient information to admit or deny the allegations in paragraph 164.

165. Legault is without sufficient information to admit or deny the allegations in paragraph 165.

166. Legault is without sufficient information to admit or deny the allegations in paragraph 166.

167. Legault is without sufficient information to admit or deny the allegations in paragraph 167.

168. Legault is without sufficient information to admit or deny the allegations in paragraph 168.

169. Legault is without sufficient information to admit or deny the allegations in paragraph 169.

170. In response to paragraph 170, it is denied Legault had any role with respect to the investigation and indictment of Williams for the charge of felon in possession of ammunition.

Legault is without sufficient information to admit or deny the remaining allegations in paragraph 170.

171. In response to paragraph 171, it is denied Legault refused to execute a valid federal arrest warrant for Williams at any time.

Legault is without sufficient information to admit or deny the remaining allegations in paragraph 171.

172. Legault is without sufficient information to admit or deny the allegations in paragraph 172.

173. Legault is without sufficient information to admit or deny the allegations in paragraph 173.

174. The allegations in paragraph 174 are denied.

175. The allegations in paragraph 175 are denied.

176. Legault is without sufficient information to admit or deny the allegations in paragraph 176.

177. Legault is without sufficient information to admit or deny the allegations in paragraph 177.

178. Legault denies the Plaintiffs' characterization of the incident that led to Female 9's arrest, and thus denies the allegations in paragraph 178. Legault denies that he was on the scene of the April 19, 2023 event. It would be shown that the report, which was administratively approved by Legault, provides adequate probable cause for the arrest of Female 9 and her companion.

It would be shown that as a result of the arrest on April 19, 2023, Female 9 subsequently pled guilty to possession of a controlled substance and resisting arrest in Washington County General Sessions Court.

179. Legault denies the Plaintiffs' characterization of the incident that led to Female 9's arrest, and thus denies the allegations in paragraph 179. Legault denies that he was on the scene of the April 19, 2023 event. It would be shown that the report, which was administratively approved by Legault, provides adequate probable cause for the arrest of Female 9 and her companion.

It would be shown that as a result of the arrest on April 19, 2023, Female 9 subsequently pled

guilty to possession of a controlled substance and resisting arrest in Washington County General Sessions Court.

180. In response to paragraph 180, it is admitted that probable cause existed for the charges of disorderly conduct and resisting arrest against Female 9.

It is admitted arresting officers conducted a search of Female 9 incident to arrest and discovered drug paraphernalia and cocaine. It is denied Legault or any other officer planted cocaine on Female 9. It would be shown Female 9 subsequently pled guilty to possession of a controlled substance in Washington County General Sessions Court.

181. Legault is without sufficient information to admit or deny the allegations in paragraph 181.

182. Legault is without sufficient information to admit or deny the allegations in paragraph 182.

183. In response to paragraph 183, it is admitted Legault approved the report that documented Female 9's arrest as a supervisor. It is denied Legault was at the scene of the arrest.

The remaining allegations in paragraph 9 are denied. Specifically, it is denied that Legault at any time had any knowledge that Female 9 was a witness to any ongoing federal sex trafficking investigation.

184. In response to paragraph 184, it is admitted the City initiated a third party assessment of JCPD's response to sexual assaults.

Legault is without information sufficient to admit or deny the reason the assessment was obtained, nor does he have sufficient information to admit or deny the scope and methodology of the assessment.

185. The allegations in paragraph 185 are denied as written. It is admitted that a 45-page report, prepared by Daigle Law Group (“DLG”) was released by the City on or about July 18, 2023.

186. In response to the allegations in paragraph 186, it is admitted that DLG conducted an assessment, although the assessment did not involve Legault, his actions or inactions. Thus, DLG’s opinions do not constitute facts to which a response is required. To the extent a response is required, and to the extent the Plaintiffs allege or infer the DLG report accuses or otherwise alleges Legault was guilty of any unlawful or wrongful conduct, the same is denied.

187. In response to the allegations in paragraph 187, it is admitted that DLG conducted an assessment, although the assessment did not involve Legault, his actions or inactions. Thus, DLG’s opinions do not constitute facts to which a response is required by this defendant. To the extent a response is required, and to the extent the Plaintiffs allege or infer the DLG report accuses or otherwise alleges Legault was guilty of any unlawful or wrongful conduct, the same is denied.

188. In response to the allegations in paragraph 188, it is admitted that DLG conducted an assessment, although the assessment did not involve Legault, his actions or inactions. Thus, DLG’s opinions do not constitute facts to which a response is required by this defendant. To the extent a response is required, and to the extent the Plaintiffs allege or infer the DLG report accuses or otherwise alleges Legault was guilty of any unlawful or wrongful conduct, the same is denied.

189. In response to the allegations in paragraph 189, it is admitted that DLG conducted an assessment, although the assessment did not involve Legault, his actions or inactions. Thus, DLG’s opinions do not constitute facts to which a response is required by this defendant. To the extent a response is required, and to the extent the Plaintiffs allege or infer the DLG report accuses or otherwise alleges Legault was guilty of any unlawful or wrongful conduct, the same is denied.

190. In response to the allegations in paragraph 190, it is admitted that DLG conducted an assessment, although the assessment did not involve Legault, his actions or inactions. Thus, DLG's opinions do not constitute facts to which a response is required by this defendant. To the extent a response is required, and to the extent the Plaintiffs allege or infer the DLG report accuses or otherwise alleges Legault was guilty of any unlawful or wrongful conduct, the same is denied.

191. In response to the allegations in paragraph 191, it is admitted that DLG conducted an assessment, although the assessment did not involve Legault, his actions or inactions. Thus, DLG's opinions do not constitute facts to which a response is required by this defendant. To the extent a response is required, and to the extent the Plaintiffs allege or infer the DLG report accuses or otherwise alleges Legault was guilty of any unlawful or wrongful conduct, the same is denied.

192. In response to the allegations in paragraph 192, it is admitted that DLG conducted an assessment, although the assessment did not involve Legault, his actions or inactions. Thus, DLG's opinions do not constitute facts to which a response is required by this defendant. To the extent a response is required, and to the extent the Plaintiffs allege or infer the DLG report accuses or otherwise alleges Legault was guilty of any unlawful or wrongful conduct, the same is denied.

193. In response to the allegations in paragraph 193, it is admitted that DLG conducted an assessment, although the assessment did not involve Legault, his actions or inactions. Thus, DLG's opinions do not constitute facts to which a response is required by this defendant. To the extent a response is required, and to the extent the Plaintiffs allege or infer the DLG report accuses or otherwise alleges Legault was guilty of any unlawful or wrongful conduct, the same is denied.

194. In response to the allegations in paragraph 194, it is admitted that DLG conducted an assessment, although the assessment did not involve Legault, his actions or inactions. Thus, DLG's

opinions do not constitute facts to which a response is required by this defendant. To the extent a response is required, and to the extent the Plaintiffs allege or infer the DLG report accuses or otherwise alleges Legault was guilty of any unlawful or wrongful conduct, the same is denied.

195. In response to the allegations in paragraph 195, it is admitted that DLG conducted an assessment, although the assessment did not involve Legault, his actions or inactions. Thus, DLG's opinions do not constitute facts to which a response is required by this defendant. To the extent a response is required, and to the extent the Plaintiffs allege or infer the DLG report accuses or otherwise alleges Legault was guilty of any unlawful or wrongful conduct, the same is denied.

196. In response to the allegations in paragraph 196, it is admitted that DLG conducted an assessment, although the assessment did not involve Legault, his actions or inactions. Thus, DLG's opinions do not constitute facts to which a response is required by this defendant. To the extent a response is required, and to the extent the Plaintiffs allege or infer the DLG report accuses or otherwise alleges Legault was guilty of any unlawful or wrongful conduct, the same is denied.

197. In response to the allegations in paragraph 197, it is admitted that DLG conducted an assessment, although the assessment did not involve Legault, his actions or inactions. Thus, DLG's opinions do not constitute facts to which a response is required by this defendant. To the extent a response is required, and to the extent the Plaintiffs allege or infer the DLG report accuses or otherwise alleges Legault was guilty of any unlawful or wrongful conduct, the same is denied.

198. In response to the allegations in paragraph 198, it is admitted that DLG conducted an assessment, although the assessment did not involve Legault, his actions or inactions. Thus, DLG's opinions do not constitute facts to which a response is required by this defendant. To the extent a response is required, and to the extent the Plaintiffs allege or infer the DLG report accuses or

otherwise alleges Legault was guilty of any unlawful or wrongful conduct, the same is denied.

199. In response to the allegations in paragraph 199, it is admitted that DLG conducted an assessment, although the assessment did not involve Legault, his actions or inactions. Thus, DLG's opinions do not constitute facts to which a response is required by this defendant. To the extent a response is required, and to the extent the Plaintiffs allege or infer the DLG report accuses or otherwise alleges Legault was guilty of any unlawful or wrongful conduct, the same is denied.

200. In response to the allegations in paragraph 200, it is admitted that DLG conducted an assessment, although the assessment did not involve Legault, his actions or inactions. Thus, DLG's opinions do not constitute facts to which a response is required by this defendant. To the extent a response is required, and to the extent the Plaintiffs allege or infer the DLG report accuses or otherwise alleges Legault was guilty of any unlawful or wrongful conduct, the same is denied.

201 In response to the allegations in paragraph 201, it is admitted that DLG conducted an assessment, although the assessment did not involve Legault, his actions or inactions. Thus, DLG's opinions do not constitute facts to which a response is required by this defendant. To the extent a response is required, and to the extent the Plaintiffs allege or infer the DLG report accuses or otherwise alleges Legault was guilty of any unlawful or wrongful conduct, the same is denied.

202. In response to the allegations in paragraph 202, it is admitted that DLG conducted an assessment, although the assessment did not involve Legault, his actions or inactions. Thus, DLG's opinions do not constitute facts to which a response is required by this defendant. To the extent a response is required, and to the extent the Plaintiffs allege or infer the DLG report accuses or otherwise alleges Legault was guilty of any unlawful or wrongful conduct, the same is denied.

203. In response to the allegations in paragraph 203, it is admitted that DLG conducted an

assessment, although the assessment did not involve Legault, his actions or inactions. Thus, DLG's opinions do not constitute facts to which a response is required by this defendant. To the extent a response is required, and to the extent the Plaintiffs allege or infer the DLG report accuses or otherwise alleges Legault was guilty of any unlawful or wrongful conduct, the same is denied.

204. In response to the allegations in paragraph 204, it is admitted that DLG conducted an assessment, although the assessment did not involve Legault, his actions or inactions. Thus, DLG's opinions do not constitute facts to which a response is required by this defendant. To the extent a response is required, and to the extent the Plaintiffs allege or infer the DLG report accuses or otherwise alleges Legault was guilty of any unlawful or wrongful conduct, the same is denied.

205. In response to the allegations in paragraph 205, it is admitted that DLG conducted an assessment, although the assessment did not involve Legault, his actions or inactions. Thus, DLG's opinions do not constitute facts to which a response is required by this defendant. To the extent a response is required, and to the extent the Plaintiffs allege or infer the DLG report accuses or otherwise alleges Legault was guilty of any unlawful or wrongful conduct, the same is denied.

206. In response to the allegations in paragraph 206, it is admitted that DLG conducted an assessment, although the assessment did not involve Legault, his actions or inactions. Thus, DLG's opinions do not constitute facts to which a response is required by this defendant. To the extent a response is required, and to the extent the Plaintiffs allege or infer the DLG report accuses or otherwise alleges Legault was guilty of any unlawful or wrongful conduct, the same is denied.

207. In response to paragraph 207, it is denied Legault had any role with respect to any investigation into Williams in June 2020. It is denied Legault ever searched Williams' apartment Legault is without information sufficient to admit or deny the remaining allegations in

paragraph 207.

208. In response to the allegations in paragraph 208, it is admitted that DLG conducted an assessment, although the assessment did not involve Legault, his actions or inactions. Thus, DLG's opinions do not constitute facts to which a response is required by this defendant. To the extent a response is required, and to the extent the Plaintiffs allege or infer the DLG report accuses or otherwise alleges Legault was guilty of any unlawful or wrongful conduct, the same is denied.

209. In response to the allegations in paragraph 209, it is admitted that DLG conducted an assessment, although the assessment did not involve Legault, his actions or inactions. Thus, DLG's opinions do not constitute facts to which a response is required by this defendant. To the extent a response is required, and to the extent the Plaintiffs allege or infer the DLG report accuses or otherwise alleges Legault was guilty of any unlawful or wrongful conduct, the same is denied.

210. In response to the allegations in paragraph 210, it is admitted that DLG conducted an assessment, although the assessment did not involve Legault, his actions or inactions. Thus, DLG's opinions do not constitute facts to which a response is required by this defendant. To the extent a response is required, and to the extent the Plaintiffs allege or infer the DLG report accuses or otherwise alleges Legault was guilty of any unlawful or wrongful conduct, the same is denied.

211. In response to the allegations in paragraph 211, it is admitted that DLG conducted an assessment, although the assessment did not involve Legault, his actions or inactions. Thus, DLG's opinions do not constitute facts to which a response is required by this defendant. To the extent a response is required, and to the extent the Plaintiffs allege or infer the DLG report accuses or otherwise alleges Legault was guilty of any unlawful or wrongful conduct, the same is denied.

212. In response to the allegations in paragraph 212, it is admitted that DLG conducted an

assessment, although the assessment did not involve Legault, his actions or inactions. Thus, DLG's opinions do not constitute facts to which a response is required by this defendant. To the extent a response is required, and to the extent the Plaintiffs allege or infer the DLG report accuses or otherwise alleges Legault was guilty of any unlawful or wrongful conduct, the same is denied.

213. In response to the allegations in paragraph 213, it is admitted that DLG conducted an assessment, although the assessment did not involve Legault, his actions or inactions. Thus, DLG's opinions do not constitute facts to which a response is required by this defendant. To the extent a response is required, and to the extent the Plaintiffs allege or infer the DLG report accuses or otherwise alleges Legault was guilty of any unlawful or wrongful conduct, the same is denied.

214. In response to the allegations in paragraph 214, it is admitted that DLG conducted an assessment, although the assessment did not involve Legault, his actions or inactions. Thus, DLG's opinions do not constitute facts to which a response is required by this defendant. To the extent a response is required, and to the extent the Plaintiffs allege or infer the DLG report accuses or otherwise alleges Legault was guilty of any unlawful or wrongful conduct, the same is denied.

215. In response to the allegations in paragraph 215, it is admitted that DLG conducted an assessment, although the assessment did not involve Legault, his actions or inactions. Thus, DLG's opinions do not constitute facts to which a response is required by this defendant. To the extent a response is required, and to the extent the Plaintiffs allege or infer the DLG report accuses or otherwise alleges Legault was guilty of any unlawful or wrongful conduct, the same is denied.

216. In response to the allegations in paragraph 216, it is admitted that DLG conducted an assessment, although the assessment did not involve Legault, his actions or inactions. Thus, DLG's opinions do not constitute facts to which a response is required by this defendant. To the extent a

response is required, and to the extent the Plaintiffs allege or infer the DLG report accuses or otherwise alleges Legault was guilty of any unlawful or wrongful conduct, the same is denied.

217. In response to the allegations in paragraph 217, it is admitted that DLG conducted an assessment, although the assessment did not involve Legault, his actions or inactions. Thus, DLG's opinions do not constitute facts to which a response is required by this defendant. To the extent a response is required, and to the extent the Plaintiffs allege or infer the DLG report accuses or otherwise alleges Legault was guilty of any unlawful or wrongful conduct, the same is denied.

218. In response to the allegations in paragraph 218, it is admitted that DLG conducted an assessment, although the assessment did not involve Legault, his actions or inactions. Thus, DLG's opinions do not constitute facts to which a response is required by this defendant. To the extent a response is required, and to the extent the Plaintiffs allege or infer the DLG report accuses or otherwise alleges Legault was guilty of any unlawful or wrongful conduct, the same is denied.

219. In response to the allegations in paragraph 219, it is admitted that DLG conducted an assessment, although the assessment did not involve Legault, his actions or inactions. Thus, DLG's opinions do not constitute facts to which a response is required by this defendant. To the extent a response is required, and to the extent the Plaintiffs allege or infer the DLG report accuses or otherwise alleges Legault was guilty of any unlawful or wrongful conduct, the same is denied.

220. In response to the allegations in paragraph 220, it is admitted that DLG conducted an assessment, although the assessment did not involve Legault, his actions or inactions. Thus, DLG's opinions do not constitute facts to which a response is required by this defendant. To the extent a response is required, and to the extent the Plaintiffs allege or infer the DLG report accuses or otherwise alleges Legault was guilty of any unlawful or wrongful conduct, the same is denied.

221. Legault is without sufficient information to admit or deny the allegations in paragraph 221.

222. Legault is without sufficient information to admit or deny the allegations in paragraph 222.

223. In response to the allegations in paragraph 223, it is admitted that DLG conducted an assessment, although the assessment did not involve Legault, his actions or inactions. Thus, DLG's opinions do not constitute facts to which a response is required by this defendant. To the extent a response is required, and to the extent the Plaintiffs allege or infer the DLG report accuses or otherwise alleges Legault was guilty of any unlawful or wrongful conduct, the same is denied.

224. Legault is without information sufficient to admit or deny the allegations in paragraph 224.

225. In response to the allegations in paragraph 225, it is admitted that DLG conducted an assessment, although the assessment did not involve Legault, his actions or inactions. Thus, DLG's opinions do not constitute facts to which a response is required by this defendant. To the extent a response is required, and to the extent the Plaintiffs allege or infer the DLG report accuses or otherwise alleges Legault was guilty of any unlawful or wrongful conduct, the same is denied.

226. In response to the allegations in paragraph 226, it is admitted that DLG conducted an assessment, although the assessment did not involve Legault, his actions or inactions. Thus, DLG's opinions do not constitute facts to which a response is required by this defendant. To the extent a response is required, and to the extent the Plaintiffs allege or infer the DLG report accuses or otherwise alleges Legault was guilty of any unlawful or wrongful conduct, the same is denied.

227. In response to the allegations in paragraph 227, it is admitted that DLG conducted an

assessment, although the assessment did not involve Legault, his actions or inactions. Thus, DLG's opinions do not constitute facts to which a response is required by this defendant. To the extent a response is required, and to the extent the Plaintiffs allege or infer the DLG report accuses or otherwise alleges Legault was guilty of any unlawful or wrongful conduct, the same is denied.

228. In response to paragraph 228, it is generally admitted that Dahl filed a lawsuit against JCPD and Chief Turner.

It is denied Legault was guilty of any unlawful or otherwise wrongful conduct that obstructed or interfered with Dahl's purported investigation.

Legault is without information sufficient to admit or deny the remaining allegations in paragraph 228.

229. Legault is without information sufficient to admit or deny the remaining allegations in paragraph 229.

230. The allegations in paragraph 230 are denied.

231. Legault is without sufficient information to admit or deny the allegations in paragraph 231.

232. Legault is without sufficient information to admit or deny the allegations in paragraph 232.

It is denied Legault was guilty of any unlawful or otherwise wrongful conduct in connection with the claims of B.P. and/or any of JCPD's subsequent investigations into those claims..

233. Legault is without sufficient information to admit or deny the allegations in paragraph 233.

It is denied Legault was guilty of any unlawful or otherwise wrongful conduct in connection

with the claims of Females 2, 3, 9, 10, and 12 and/or any of JCPD's subsequent investigations into those claims..

234. Legault is without sufficient information to admit or deny the allegations in paragraph 234.

235. Legault is without sufficient information to admit or deny the allegations in paragraph 235.

236. Legault is without sufficient information to admit or deny the allegations in paragraph 236.

It is denied Legault discouraged any reporter of sexual assault from pursuing charges against Williams.

It is denied Legault failed to believe or address women's accounts of crime with the City.

237. Legault is without sufficient information to admit or deny the allegations in paragraph 237.

It is denied Legault was guilty of any unlawful or otherwise wrongful conduct that discriminated against women.

238. Legault is without sufficient information to admit or deny the allegations in paragraph 238.

It is denied Legault failed to protect Williams' alleged victims.

It is denied Legault was motivated by any discriminatory animus towards women.

It is denied Legault acted at any material time pursuant to any unlawful policy, procedure or custom.

239. Legault is without sufficient information to admit or deny the allegations in paragraph

239.

It is denied Legault acted at any material time pursuant to any unlawful policy, procedure or custom.

240. Legault is without sufficient information to admit or deny the allegations in paragraph 240.

It is denied Legault acted at any material time pursuant to any unlawful policy, procedure or custom.

241. Legault is without sufficient information to admit or deny the allegations in paragraph 241.

It is denied Legault acted at any material time pursuant to any unlawful policy, procedure or custom.

242. Legault is without sufficient information to admit or deny the allegations in paragraph 242.

It is denied Legault acted at any material time pursuant to any unlawful policy, procedure or custom.

It is denied Legault acted with any discriminatory animus towards women.

243. Legault is without sufficient information to admit or deny the allegations in paragraph 243.

Legault would show the content of the DLG report speaks for itself and is best evidence thereof.

It is denied Legault at took any steps to discourage victims from pursuing charges at any material time.

It is denied Legault acted at any material pursuant to any unwarranted gender-based assumptions or stereotypes.

244. Legault is without sufficient information to admit or deny the allegations in paragraph 244.

It is denied Legault at took any steps to discourage victims from pursuing charges at any material time.

It is denied Legault acted at any material pursuant to any unwarranted gender-based assumptions or stereotypes.

245. Legault is without sufficient information to admit or deny the allegations in paragraph 245.

It is denied Legault acted at any material time pursuant to any unlawful policy, procedure or custom.

Legault would show the content of the DLG report speaks for itself and is best evidence thereof.

It is denied Legault ever made any statement to Dahl which evidenced any discriminatory animus towards women victims of sexual assault.

246. Legault is without information sufficient to admit or deny the allegations in paragraph 246.

247. Legault is without sufficient information to admit or deny the allegations in paragraph 247.

248. Legault is without sufficient information to admit or deny the allegations in paragraph 248. Legault denies making the comment quoted in paragraph 248.

249. Legault is without sufficient information to admit or deny the allegations in paragraph 249.

It is denied Legault made harassing comments to Dahl.

250. Legault is without sufficient information to admit or deny the allegations in paragraph 250.

It is denied Legault made the quoted statement in paragraph 250.

251. Legault is without sufficient information to admit or deny the allegations in paragraph 251.

It is denied Legault ever acted pursuant to any alleged unlawful policy, procedure or custom of discrimination toward Williams' women victims.

252. Legault is without sufficient information to admit or deny the allegations in paragraph 252.

It is denied Legault ever acted pursuant to any alleged unlawful policy, procedure or custom of discrimination toward Williams' women victims.

253. Legault is without sufficient information to admit or deny the allegations in paragraph 253.

It is denied Legault ever investigated any sexual assault claims against Williams.

It is denied Legault failed to act on any reports of sexual assault by Williams.

254. Legault is without sufficient information to admit or deny the allegations in paragraph 254.

It is denied Legault participated in any policy and practice of failing to process and investigate complaints of sexual assault by women against Williams.

It is denied Legault had any discriminatory animus towards women.

255. Legault is without sufficient information to admit or deny the allegations in paragraph 255.

It is denied Legault was guilty of any unlawful or otherwise wrongful conduct which caused any injury to the Plaintiffs.

256. Legault is without sufficient information to admit or deny the allegations in paragraph 256.

It is admitted generally that various news agencies have reported the existence of at least 52 victims of Williams.

257. Legault is without information sufficient to admit or deny the allegations in paragraph 257.

258. Legault is without information sufficient to admit or deny the allegations in paragraph 258.

To the extent paragraph 258 contains legal conclusions, no response is required.

Defendant Legault avers Plaintiffs claims may be barred by the statute of limitations.

259. Legault is without information sufficient to admit or deny the allegations in paragraph 259.

260. Legault is without information sufficient to admit or deny the allegations in paragraph 260.

261. Legault is without information sufficient to admit or deny the allegations in paragraph 261.

262. Legault is without information sufficient to admit or deny the allegations in paragraph

262.

263. Legault is without information sufficient to admit or deny the allegations in paragraph 263.

264. Legault is without information sufficient to admit or deny the allegations in paragraph 264.

265. Legault is without information sufficient to admit or deny the allegations in paragraph 265.

266. Legault is without information sufficient to admit or deny the allegations in paragraph 266.

267. Legault is without information sufficient to admit or deny the allegations in paragraph 267.

268. Legault is without information sufficient to admit or deny the allegations in paragraph 268.

269. Legault is without information sufficient to admit or deny the allegations in paragraph 269.

270. Legault is without information sufficient to admit or deny the allegations in paragraph 270.

271. Legault is without information sufficient to admit or deny the allegations in paragraph 271.

272. Legault is without information sufficient to admit or deny the allegations in paragraph 272.

273. Legault is without information sufficient to admit or deny the allegations in paragraph

273.

274. Legault is without information sufficient to admit or deny the allegations in paragraph
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275. Legault is without information sufficient to admit or deny the allegations in paragraph
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276. Legault is without information sufficient to admit or deny the allegations in paragraph
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277. Legault is without information sufficient to admit or deny the allegations in paragraph
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278. Legault is without information sufficient to admit or deny the allegations in paragraph
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279. Legault is without information sufficient to admit or deny the allegations in paragraph
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280. Legault is without information sufficient to admit or deny the allegations in paragraph
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281. Legault is without information sufficient to admit or deny the allegations in paragraph
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282. Legault is without information sufficient to admit or deny the allegations in paragraph
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283. Legault is without information sufficient to admit or deny the allegations in paragraph
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284. Legault is without information sufficient to admit or deny the allegations in paragraph

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285. Legault is without information sufficient to admit or deny the allegations in paragraph 285.

286. Legault is without information sufficient to admit or deny the allegations in paragraph 286.

287. Legault is without information sufficient to admit or deny the allegations in paragraph 287.

288. Legault is without information sufficient to admit or deny the allegations in paragraph 288.

289. Legault is without information sufficient to admit or deny the allegations in paragraph 289.

290. Legault is without information sufficient to admit or deny the allegations in paragraph 290.

291. Legault is without information sufficient to admit or deny the allegations in paragraph 291.

292. Legault is without information sufficient to admit or deny the allegations in paragraph 292.

293. In response to paragraph 293, it is denied Legault failed to properly investigate the claims of S.H. or purported members of the Reporter Survivor Class.

Legault is without information sufficient to admit or deny the remaining allegations in paragraph 293.

294. Legault is without information sufficient to admit or deny the allegations in paragraph

294.

295. In response to paragraph 295, it is denied Legault participated in any alleged pattern or practice of not investigating claims of sexual assault made by women.

Legault is without information sufficient to admit or deny the remaining allegations in paragraph 295.

Legault avers the statute of limitations may bar Plaintiffs' claims.

296. Paragraph 296 contains legal conclusions to which no response is required.

To the extent a response is required, Legault lacks sufficient information to admit or deny the allegations in paragraph 296.

Legault avers the statute of limitations may bar Plaintiffs' claims.

297. In response to paragraph 297, it is denied that Legault was guilty of any unlawful or otherwise wrongful conduct that resulted in any injury to the Plaintiffs.

It is denied Legault participated in any alleged ongoing policy and practice of refusing to believe, investigate or address complaints of sexual assault by Williams or any others.

It is denied Legault ever dissuaded a sexual assault victim from pursuing their claim(s).

Legault is without information sufficient to admit or deny the nature and extent of the Plaintiff's alleged injuries.

298. Paragraph 298 contains legal conclusions to which no response is required.

To the extent a response is required, it is denied the proposed classes listed and defined in paragraph 298 meet the numerosity, commonality, typicality and adequacy of representation requirements of Fed. R. Civ. P. 23.

299. Paragraph 299 contains legal conclusions to which no response is required.

It is denied the Plaintiffs state any claim against Legault upon which relief may be granted.

300. Paragraph 300 contains legal conclusions to which no response is required.

It is denied the Plaintiffs state any claim against Legault upon which relief may be granted.

301. Paragraph 301 contains legal conclusions to which no response is required.

It is denied the Plaintiffs state any claim against Legault upon which relief may be granted.

302. Paragraph 302 contains no factual allegations to which a response from Legault is required.

303. In response to paragraph 303, Legault is without sufficient information to admit or deny the number of individuals who purportedly make up any of the classes proposed by the Plaintiffs.

304. The allegations in paragraph 304 are legal conclusions to which no response is required.

To the extent a response is required, the allegations in paragraph 304 are denied.

305. The allegations in paragraph 305 are legal conclusions to which no response is required.

To the extent a response is required, it is denied Legault relied on gender-based stereotypes and bias.

It is denied Legault discriminated against women victims of sexual assault.

It is denied Legault relied on women's sexual history in evaluating the veracity of their reports.

Legault lacks sufficient information to admit or deny the remaining allegations in paragraph 305.

306. Paragraph 306 contains legal conclusions to which no response is required.

To the extent a response is required, it is denied Legault was guilty of any unlawful or otherwise wrongful conduct in connection with the investigation of any sexual assault claim.

307. Paragraph 307 contains legal conclusions to which no response is required.

To the extent a response is required, it is denied Legault was guilty of any unlawful or otherwise wrongful conduct in connection with the investigation of any sexual assault claim.

308. Paragraph 308 contains legal conclusions to which no response is required.

To the extent a response is required, it is denied Legault was guilty of any unlawful or otherwise wrongful conduct in connection with the investigation of any sexual assault claim.

309. Paragraph 309 contains legal conclusions to which no response is required.

To the extent a response is required, it is denied Legault was guilty of any unlawful or otherwise wrongful conduct in connection with the investigation of any sexual assault claim.

310. Paragraph 310 contains legal conclusions to which no response is required.

To the extent a response is required, it is denied Legault was guilty of any unlawful or otherwise wrongful conduct in connection with the investigation of any sexual assault claim.

311. Paragraph 311 contains no factual allegations to which a response is required.

312. The allegations in paragraph 312 are directed at other defendants. Accordingly, no response from Legault is required.

To the extent a response is required, it is denied Legault was guilty of any unlawful or otherwise wrongful conduct which caused any injury to the Plaintiffs.

313. The allegations in paragraph 313 are directed at other defendants. Accordingly, no response from Legault is required.

To the extent a response is required, it is denied Legault was guilty of any unlawful or otherwise wrongful conduct which caused any injury to the Plaintiffs.

314. The allegations in paragraph 314 are directed at other defendants. Accordingly, no

response from Legault is required.

To the extent a response is required, it is denied Legault was guilty of any unlawful or otherwise wrongful conduct which caused any injury to the Plaintiffs.

315. The allegations in paragraph 315 are directed at other defendants. Accordingly, no response from Legault is required.

To the extent a response is required, it is denied Legault was guilty of any unlawful or otherwise wrongful conduct which caused any injury to the Plaintiffs.

316. The allegations in paragraph 316 are directed at other defendants. Accordingly, no response from Legault is required.

To the extent a response is required, it is denied Legault was guilty of any unlawful or otherwise wrongful conduct which caused any injury to the Plaintiffs.

317. The allegations in paragraph 317 are directed at other defendants. Accordingly, no response from Legault is required.

To the extent a response is required, it is denied Legault was guilty of any unlawful or otherwise wrongful conduct which caused any injury to the Plaintiffs.

318. The allegations in paragraph 318 are directed at other defendants. Accordingly, no response from Legault is required.

To the extent a response is required, it is denied Legault was guilty of any unlawful or otherwise wrongful conduct which caused any injury to the Plaintiffs.

319. The allegations in paragraph 319 are directed at other defendants. Accordingly, no response from Legault is required.

To the extent a response is required, it is denied Legault was guilty of any unlawful or

otherwise wrongful conduct which caused any injury to the Plaintiffs.

320. The allegations in paragraph 320 are directed at other defendants. Accordingly, no response from Legault is required.

To the extent a response is required, it is denied Legault was guilty of any unlawful or otherwise wrongful conduct which caused any injury to the Plaintiffs.

321. The allegations in paragraph 321 are directed at other defendants. Accordingly, no response from Legault is required.

To the extent a response is required, it is denied Legault was guilty of any unlawful or otherwise wrongful conduct which caused any injury to the Plaintiffs.

322. The allegations in paragraph 322 are directed at other defendants. Accordingly, no response from Legault is required.

To the extent a response is required, it is denied Legault was guilty of any unlawful or otherwise wrongful conduct which caused any injury to the Plaintiffs.

323. The allegations in paragraph 323 are directed at other defendants. Accordingly, no response from Legault is required.

To the extent a response is required, it is denied Legault was guilty of any unlawful or otherwise wrongful conduct which caused any injury to the Plaintiffs.

324. The allegations in paragraph 324 are directed at other defendants. Accordingly, no response from Legault is required.

To the extent a response is required, it is denied Legault was guilty of any unlawful or otherwise wrongful conduct which caused any injury to the Plaintiffs.

325. The allegations in paragraph 325 are directed at other defendants. Accordingly, no

response from Legault is required.

To the extent a response is required, it is denied Legault was guilty of any unlawful or otherwise wrongful conduct which caused any injury to the Plaintiffs.

326. The allegations in paragraph 326 are directed at other defendants. Accordingly, no response from Legault is required.

To the extent a response is required, it is denied Legault was guilty of any unlawful or otherwise wrongful conduct which caused any injury to the Plaintiffs.

327. Paragraph 327 contains no factual allegations to which a response is required.

328. In response to paragraph 328, it is denied Legault was guilty of any unlawful or otherwise wrongful conduct that obstructed or in any way prevented enforcement of 18 U.S.C. §§1591(a)(1), (2).

329. The allegations in paragraph 329 are denied.

330. The allegations in paragraph 330 are denied.

331. In response to paragraph 331, it is denied Legault knew of any alleged sex trafficking venture.

It is denied Legault was guilty of any unlawful or otherwise wrongful act which obstructed or prevented the enforcement of 18 U.S.C. §§1591(a)(1), (2).

332. The allegations in paragraph 328 are denied.

333. The allegations in paragraph 333 are denied.

334. The allegations in paragraph 334 are denied.

335. The allegations in paragraph 335 are denied.

336. The allegations in paragraph 336 are denied.

337. Paragraph 337 contains no factual allegations to which a response is required.

To the extent a response is required, it is denied Legault was guilty of any unlawful or otherwise wrongful conduct which caused any injury to the Plaintiffs.

338. Paragraph 338 contains no factual allegations to which a response is required.

339. The allegations in paragraph 339 are directed at other defendants. Accordingly, no response from Legault is required.

To the extent a response is required, it is denied Legault was guilty of any unlawful or otherwise wrongful conduct which caused any injury to the Plaintiffs.

340. The allegations in paragraph 340 are directed at other defendants. Accordingly, no response from Legault is required.

To the extent a response is required, it is denied Legault was guilty of any unlawful or otherwise wrongful conduct which caused any injury to the Plaintiffs.

341. The allegations in paragraph 341 are directed at other defendants. Accordingly, no response from Legault is required.

To the extent a response is required, it is denied Legault was guilty of any unlawful or otherwise wrongful conduct which caused any injury to the Plaintiffs.

342. The allegations in paragraph 342 are directed at other defendants. Accordingly, no response from Legault is required.

To the extent a response is required, it is denied Legault was guilty of any unlawful or otherwise wrongful conduct which caused any injury to the Plaintiffs.

343. The allegations in paragraph 343 are directed at other defendants. Accordingly, no response from Legault is required.

To the extent a response is required, it is denied Legault was guilty of any unlawful or otherwise wrongful conduct which caused any injury to the Plaintiffs.

344. The allegations in paragraph 344 are directed at other defendants. Accordingly, no response from Legault is required.

To the extent a response is required, it is denied Legault was guilty of any unlawful or otherwise wrongful conduct which caused any injury to the Plaintiffs.

345. The allegations in paragraph 345 are directed at other defendants. Accordingly, no response from Legault is required.

To the extent a response is required, it is denied Legault was guilty of any unlawful or otherwise wrongful conduct which caused any injury to the Plaintiffs.

346. The allegations in paragraph 346 are directed at other defendants. Accordingly, no response from Legault is required.

To the extent a response is required, it is denied Legault was guilty of any unlawful or otherwise wrongful conduct which caused any injury to the Plaintiffs.

347. The allegations in paragraph 347 are directed at other defendants. Accordingly, no response from Legault is required.

To the extent a response is required, it is denied Legault was guilty of any unlawful or otherwise wrongful conduct which caused any injury to the Plaintiffs.

348. The allegations in paragraph 348 are directed at other defendants. Accordingly, no response from Legault is required.

To the extent a response is required, it is denied Legault was guilty of any unlawful or otherwise wrongful conduct which caused any injury to the Plaintiffs.

349. The allegations in paragraph 349 are directed at other defendants. Accordingly, no response from Legault is required.

To the extent a response is required, it is denied Legault was guilty of any unlawful or otherwise wrongful conduct which caused any injury to the Plaintiffs.

350. The allegations in paragraph 350 are directed at other defendants. Accordingly, no response from Legault is required.

To the extent a response is required, it is denied Legault was guilty of any unlawful or otherwise wrongful conduct which caused any injury to the Plaintiffs.

351. The allegations in paragraph 351 are directed at other defendants. Accordingly, no response from Legault is required.

To the extent a response is required, it is denied Legault was guilty of any unlawful or otherwise wrongful conduct which caused any injury to the Plaintiffs.

352. The allegations in paragraph 352 are directed at other defendants. Accordingly, no response from Legault is required.

To the extent a response is required, it is denied Legault was guilty of any unlawful or otherwise wrongful conduct which caused any injury to the Plaintiffs.

353. The allegations in paragraph 353 are directed at other defendants. Accordingly, no response from Legault is required.

To the extent a response is required, it is denied Legault was guilty of any unlawful or otherwise wrongful conduct which caused any injury to the Plaintiffs.

354. The allegations in paragraph 354 are directed at other defendants. Accordingly, no response from Legault is required.

To the extent a response is required, it is denied Legault was guilty of any unlawful or otherwise wrongful conduct which caused any injury to the Plaintiffs.

355. Paragraph 355 contains no factual allegations to which a response is required.

356. The allegations in paragraph 356 are directed at other defendants. Accordingly, no response from Legault is required.

To the extent a response is required, it is denied Legault was guilty of any unlawful or otherwise wrongful conduct which caused any injury to the Plaintiffs.

357. The allegations in paragraph 357 are directed at other defendants. Accordingly, no response from Legault is required.

To the extent a response is required, it is denied Legault was guilty of any unlawful or otherwise wrongful conduct which caused any injury to the Plaintiffs.

358. The allegations in paragraph 358 are directed at other defendants. Accordingly, no response from Legault is required.

To the extent a response is required, it is denied Legault was guilty of any unlawful or otherwise wrongful conduct which caused any injury to the Plaintiffs.

359. The allegations in paragraph 359 are directed at other defendants. Accordingly, no response from Legault is required.

To the extent a response is required, it is denied Legault was guilty of any unlawful or otherwise wrongful conduct which caused any injury to the Plaintiffs.

360. The allegations in paragraph 360 are directed at other defendants. Accordingly, no response from Legault is required.

To the extent a response is required, it is denied Legault was guilty of any unlawful or

otherwise wrongful conduct which caused any injury to the Plaintiffs.

361. The allegations in paragraph 361 are directed at other defendants. Accordingly, no response from Legault is required.

To the extent a response is required, it is denied Legault was guilty of any unlawful or otherwise wrongful conduct which caused any injury to the Plaintiffs.

362. The allegations in paragraph 362 are directed at other defendants. Accordingly, no response from Legault is required.

To the extent a response is required, it is denied Legault was guilty of any unlawful or otherwise wrongful conduct which caused any injury to the Plaintiffs.

363. The allegations in paragraph 363 are directed at other defendants. Accordingly, no response from Legault is required.

To the extent a response is required, it is denied Legault was guilty of any unlawful or otherwise wrongful conduct which caused any injury to the Plaintiffs.

364. The allegations in paragraph 364 are directed at other defendants. Accordingly, no response from Legault is required.

To the extent a response is required, it is denied Legault was guilty of any unlawful or otherwise wrongful conduct which caused any injury to the Plaintiffs.

365. The allegations in paragraph 365 are directed at other defendants. Accordingly, no response from Legault is required.

To the extent a response is required, it is denied Legault was guilty of any unlawful or otherwise wrongful conduct which caused any injury to the Plaintiffs.

366. The allegations in paragraph 366 are directed at other defendants. Accordingly, no

response from Legault is required.

To the extent a response is required, it is denied Legault was guilty of any unlawful or otherwise wrongful conduct which caused any injury to the Plaintiffs.

367. Paragraph 367 contains no factual allegations to which a response is required.

368. The allegations in paragraph 368 are directed at other defendants. Accordingly, no response from Legault is required.

To the extent a response is required, it is denied Legault was guilty of any unlawful or otherwise wrongful conduct which caused any injury to the Plaintiffs.

369. The allegations in paragraph 369 are directed at other defendants. Accordingly, no response from Legault is required.

To the extent a response is required, it is denied Legault was guilty of any unlawful or otherwise wrongful conduct which caused any injury to the Plaintiffs.

370. The allegations in paragraph 370 are directed at other defendants. Accordingly, no response from Legault is required.

To the extent a response is required, it is denied Legault was guilty of any unlawful or otherwise wrongful conduct which caused any injury to the Plaintiffs.

371. The allegations in paragraph 371 are directed at other defendants. Accordingly, no response from Legault is required.

To the extent a response is required, it is denied Legault was guilty of any unlawful or otherwise wrongful conduct which caused any injury to the Plaintiffs.

372. The allegations in paragraph 372 are directed at other defendants. Accordingly, no response from Legault is required.

To the extent a response is required, it is denied Legault was guilty of any unlawful or otherwise wrongful conduct which caused any injury to the Plaintiffs.

373. The allegations in paragraph 373 are directed at other defendants. Accordingly, no response from Legault is required.

To the extent a response is required, it is denied Legault was guilty of any unlawful or otherwise wrongful conduct which caused any injury to the Plaintiffs.

374. The allegations in paragraph 374 are directed at other defendants. Accordingly, no response from Legault is required.

To the extent a response is required, it is denied Legault was guilty of any unlawful or otherwise wrongful conduct which caused any injury to the Plaintiffs.

375. The allegations in paragraph 375 are directed at other defendants. Accordingly, no response from Legault is required.

To the extent a response is required, it is denied Legault was guilty of any unlawful or otherwise wrongful conduct which caused any injury to the Plaintiffs.

376. The allegations in paragraph 376 are directed at other defendants. Accordingly, no response from Legault is required.

To the extent a response is required, it is denied Legault was guilty of any unlawful or otherwise wrongful conduct which caused any injury to the Plaintiffs.

377. The allegations in paragraph 377 are directed at other defendants. Accordingly, no response from Legault is required.

To the extent a response is required, it is denied Legault was guilty of any unlawful or otherwise wrongful conduct which caused any injury to the Plaintiffs.

378. The allegations in paragraph 378 are directed at other defendants. Accordingly, no response from Legault is required.

To the extent a response is required, it is denied Legault was guilty of any unlawful or otherwise wrongful conduct which caused any injury to the Plaintiffs.

379. The allegations in paragraph 379 are directed at other defendants. Accordingly, no response from Legault is required.

To the extent a response is required, it is denied Legault was guilty of any unlawful or otherwise wrongful conduct which caused any injury to the Plaintiffs.

380. The allegations in paragraph 380 are directed at other defendants. Accordingly, no response from Legault is required.

To the extent a response is required, it is denied Legault was guilty of any unlawful or otherwise wrongful conduct which caused any injury to the Plaintiffs.

381. The allegations in paragraph 381 are directed at other defendants. Accordingly, no response from Legault is required.

To the extent a response is required, it is denied Legault was guilty of any unlawful or otherwise wrongful conduct which caused any injury to the Plaintiffs.

382. Paragraph 382 contains no factual allegations to which a response is required.

383. The allegations in paragraph 383 are directed at other defendants. Accordingly, no response from Legault is required.

To the extent a response is required, it is denied Legault was guilty of any unlawful or otherwise wrongful conduct which caused any injury to the Plaintiffs.

384. The allegations in paragraph 384 are directed at other defendants. Accordingly, no

response from Legault is required.

To the extent a response is required, it is denied Legault was guilty of any unlawful or otherwise wrongful conduct which caused any injury to the Plaintiffs.

385. The allegations in paragraph 385 are directed at other defendants. Accordingly, no response from Legault is required.

To the extent a response is required, it is denied Legault was guilty of any unlawful or otherwise wrongful conduct which caused any injury to the Plaintiffs.

386. The allegations in paragraph 386 are directed at other defendants. Accordingly, no response from Legault is required.

To the extent a response is required, it is denied Legault was guilty of any unlawful or otherwise wrongful conduct which caused any injury to the Plaintiffs.

387. The allegations in paragraph 387 are directed at other defendants. Accordingly, no response from Legault is required.

To the extent a response is required, it is denied Legault was guilty of any unlawful or otherwise wrongful conduct which caused any injury to the Plaintiffs.

388. The allegations in paragraph 388 are directed at other defendants. Accordingly, no response from Legault is required.

To the extent a response is required, it is denied Legault was guilty of any unlawful or otherwise wrongful conduct which caused any injury to the Plaintiffs.

389. Paragraph 389 contains no factual allegations to which a response is required.

390. The allegations in paragraph 390 are directed at other defendants. Accordingly, no response from Legault is required.

To the extent a response is required, it is denied Legault was guilty of any unlawful or otherwise wrongful conduct which caused any injury to the Plaintiffs.

391. The allegations in paragraph 391 are directed at other defendants. Accordingly, no response from Legault is required.

To the extent a response is required, it is denied Legault was guilty of any unlawful or otherwise wrongful conduct which caused any injury to the Plaintiffs.

392. The allegations in paragraph 392 are directed at other defendants. Accordingly, no response from Legault is required.

To the extent a response is required, it is denied Legault was guilty of any unlawful or otherwise wrongful conduct which caused any injury to the Plaintiffs.

393. The allegations in paragraph 393 are directed at other defendants. Accordingly, no response from Legault is required.

To the extent a response is required, it is denied Legault was guilty of any unlawful or otherwise wrongful conduct which caused any injury to the Plaintiffs.

394. The allegations in paragraph 394 are directed at other defendants. Accordingly, no response from Legault is required.

To the extent a response is required, it is denied Legault was guilty of any unlawful or otherwise wrongful conduct which caused any injury to the Plaintiffs.

395. Paragraph 395 contains no factual allegations to which a response is required.

396. The allegations in paragraph 396 are directed at other defendants. Accordingly, no response from Legault is required.

To the extent a response is required, it is denied Legault was guilty of any unlawful or

otherwise wrongful conduct which caused any injury to the Plaintiffs.

397. The allegations in paragraph 397 are directed at other defendants. Accordingly, no response from Legault is required.

To the extent a response is required, it is denied Legault was guilty of any unlawful or otherwise wrongful conduct which caused any injury to the Plaintiffs.

398. The allegations in paragraph 398 are directed at other defendants. Accordingly, no response from Legault is required.

To the extent a response is required, it is denied Legault was guilty of any unlawful or otherwise wrongful conduct which caused any injury to the Plaintiffs.

399. The allegations in paragraph 399 are directed at other defendants. Accordingly, no response from Legault is required.

To the extent a response is required, it is denied Legault was guilty of any unlawful or otherwise wrongful conduct which caused any injury to the Plaintiffs.

400. The allegations in paragraph 400 are directed at other defendants. Accordingly, no response from Legault is required.

To the extent a response is required, it is denied Legault was guilty of any unlawful or otherwise wrongful conduct which caused any injury to the Plaintiffs.

401. The allegations in paragraph 401 are directed at other defendants. Accordingly, no response from Legault is required.

To the extent a response is required, it is denied Legault was guilty of any unlawful or otherwise wrongful conduct which caused any injury to the Plaintiffs.

402. The allegations in paragraph 402 are directed at other defendants. Accordingly, no

response from Legault is required.

To the extent a response is required, it is denied Legault was guilty of any unlawful or otherwise wrongful conduct which caused any injury to the Plaintiffs.

403. The allegations in paragraph 403 are directed at other defendants. Accordingly, no response from Legault is required.

To the extent a response is required, it is denied Legault was guilty of any unlawful or otherwise wrongful conduct which caused any injury to the Plaintiffs.

404. The allegations in paragraph 404 are directed at other defendants. Accordingly, no response from Legault is required.

To the extent a response is required, it is denied Legault was guilty of any unlawful or otherwise wrongful conduct which caused any injury to the Plaintiffs.

405. The allegations in paragraph 405 are directed at other defendants. Accordingly, no response from Legault is required.

To the extent a response is required, it is denied Legault was guilty of any unlawful or otherwise wrongful conduct which caused any injury to the Plaintiffs.

406. The allegations in paragraph 406 are directed at other defendants. Accordingly, no response from Legault is required.

To the extent a response is required, it is denied Legault was guilty of any unlawful or otherwise wrongful conduct which caused any injury to the Plaintiffs.

407. The allegations in paragraph 407 are directed at other defendants. Accordingly, no response from Legault is required.

To the extent a response is required, it is denied Legault was guilty of any unlawful or

otherwise wrongful conduct which caused any injury to the Plaintiffs.

408. The allegations in paragraph 408 are directed at other defendants. Accordingly, no response from Legault is required.

To the extent a response is required, it is denied Legault was guilty of any unlawful or otherwise wrongful conduct which caused any injury to the Plaintiffs.

409. Paragraph 409 contains no factual allegations to which a response is required.

410. The allegations in paragraph 410 are directed at other defendants. Accordingly, no response from Legault is required.

To the extent a response is required, it is denied Legault was guilty of any unlawful or otherwise wrongful conduct which caused any injury to the Plaintiffs.

411. The allegations in paragraph 411 are directed at other defendants. Accordingly, no response from Legault is required.

To the extent a response is required, it is denied Legault was guilty of any unlawful or otherwise wrongful conduct which caused any injury to the Plaintiffs.

412. The allegations in paragraph 412 are directed at other defendants. Accordingly, no response from Legault is required.

To the extent a response is required, it is denied Legault was guilty of any unlawful or otherwise wrongful conduct which caused any injury to the Plaintiffs.

413. The allegations in paragraph 413 are directed at other defendants. Accordingly, no response from Legault is required.

To the extent a response is required, it is denied Legault was guilty of any unlawful or otherwise wrongful conduct which caused any injury to the Plaintiffs.

414. The allegations in paragraph 414 are directed at other defendants. Accordingly, no response from Legault is required.

To the extent a response is required, it is denied Legault was guilty of any unlawful or otherwise wrongful conduct which caused any injury to the Plaintiffs.

415. The allegations in paragraph 415 are directed at other defendants. Accordingly, no response from Legault is required.

To the extent a response is required, it is denied Legault was guilty of any unlawful or otherwise wrongful conduct which caused any injury to the Plaintiffs.

416. The allegations in paragraph 416 are directed at other defendants. Accordingly, no response from Legault is required.

To the extent a response is required, it is denied Legault was guilty of any unlawful or otherwise wrongful conduct which caused any injury to the Plaintiffs.

417. The allegations in paragraph 417 are directed at other defendants. Accordingly, no response from Legault is required.

To the extent a response is required, it is denied Legault was guilty of any unlawful or otherwise wrongful conduct which caused any injury to the Plaintiffs.

418. The allegations in paragraph 418 are directed at other defendants. Accordingly, no response from Legault is required.

To the extent a response is required, it is denied Legault was guilty of any unlawful or otherwise wrongful conduct which caused any injury to the Plaintiffs.

419. The allegations in paragraph 419 are directed at other defendants. Accordingly, no response from Legault is required.

To the extent a response is required, it is denied Legault was guilty of any unlawful or otherwise wrongful conduct which caused any injury to the Plaintiffs.

420. The allegations in paragraph 420 are directed at other defendants. Accordingly, no response from Legault is required.

To the extent a response is required, it is denied Legault was guilty of any unlawful or otherwise wrongful conduct which caused any injury to the Plaintiffs.

421. The allegations in paragraph 421 are directed at other defendants. Accordingly, no response from Legault is required.

To the extent a response is required, it is denied Legault was guilty of any unlawful or otherwise wrongful conduct which caused any injury to the Plaintiffs.

422. The allegations in paragraph 422 are directed at other defendants. Accordingly, no response from Legault is required.

To the extent a response is required, it is denied Legault was guilty of any unlawful or otherwise wrongful conduct which caused any injury to the Plaintiffs.

423. The allegations in paragraph 423 are directed at other defendants. Accordingly, no response from Legault is required.

To the extent a response is required, it is denied Legault was guilty of any unlawful or otherwise wrongful conduct which caused any injury to the Plaintiffs.

424. In response to the section of the SAC titled “RELIEF REQUESTED”, it is denied the Plaintiffs are entitled to judgment or an award of damages against Legault as it is denied Legault was guilty of any unlawful or otherwise wrongful conduct that harmed the Plaintiffs.

425. All other allegations, contentions, and conclusions in the Plaintiffs’ Complaint, SAC

which have not been admitted, explained or denied are here and now denied.

And now, having fully responded to the specific allegations in the SAC, Legault asserts the following affirmative defenses:

426. The SAC fails to plausibly state a claim for relief against Legault under any theory of recovery.

427. Legault relies upon the defense of qualified immunity.

428. Legault relies upon the immunities provided in the Tenn. C. Ann. §29-20-101, et seq.

429. Legault avers he did not know nor should he have known of the existence of any alleged sex trafficking venture.

430. Legault avers he was not guilty of any conduct that could be construed as having participated in an alleged sex trafficking venture.

431. Legault avers that he at no time acted in his individual capacity. Legault reserves the right to seek attorney's fees pursuant to T.C.A. §29-20-113 if the claims against him are dismissed.

432. Legault avers that certain claims against him are barred by the statute of limitations.

433. Any allegation expressly or impliedly asserting a conspiracy fails to state a claim due to a lack of specificity and meeting the requirements of pleading a civil conspiracy.

434. The Intracorporate Conspiracy Doctrine is affirmatively asserted as a bar to some or all of any conspiracy claims expressly or impliedly asserted.

435. Plaintiffs are without standing to sue Legault.

436. Plaintiffs have no substantive due process rights to be protected from a third-party.

437. Plaintiffs cannot meet the requirements for a class action.

438. Legault reserves the right to amend this Answer pending discovery.

439. Legault demands a jury.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing pleading was filed electronically on August 28, 2024. Notice of this filing will be sent by operation of the Court's electronic filing system to all parties indicated on the electronic filing receipt. All other parties will be served by regular U.S. Mail. Parties may access this filing through the Court's electronic filing system.

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